

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:  LISA NGUYEN, Debtor,  TOYOTA MOTOR CREDIT CORPORATION,  Movant,  v.  LISA NGUYEN, SACHA DISTEL BALMACEDA LOPEZ, and WILLIAM C. MILLER, Trustee,  Respondents.	Bankruptcy No. 18-16367-elf  Chapter 13  Document No.
--	---

NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

Toyota Motor Credit Corporation, has filed a Motion for Relief from the Automatic Stay and Co-Debtor Stay with the Court to lift the automatic stay regarding the 2014 Toyota Corolla, VIN# 2T1BURHE6EC226445.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **Friday, February 19, 2021**, you or your attorney must do **all** of the following:

(a) file an answer explaining your position at:

Clerk, U.S. Bankruptcy Court  
Robert C. Nix Bldg. Suite 201  
900 Market Street  
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Keri P. Ebeck, Esquire  
Bernstein-Burkley, P.C.  
707 Grant Street  
Suite 2200, Gulf Tower  
Pittsburgh, PA 15219  
(412) 456-8112

2. If you or your attorney do not take these steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on **Tuesday, March 2, 2021, at 9:30 A.M.** in Courtroom # 1, United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107.

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

Respectfully submitted,

BERNSTEIN-BURKLEY, P.C.

By: /s/Keri P. Ebeck  
Keri P. Ebeck, Esq.  
PA I.D. # 91298  
[kebeck@bernsteinlaw.com](mailto:kebeck@bernsteinlaw.com)  
707 Grant Street  
Suite 2200, Gulf Tower  
Pittsburgh, PA 15219  
Phone - (412) 456-8112  
Fax - (412) 456-8135

Counsel for Toyota Motor Credit Corporation

Dated: February 5, 2021